



1 March 2016

Via ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW, Room TW-A325  
Washington, DC 20554

Re: EB Docket No. 06-36  
Skype Communications US Corp. CPNI Compliance Certification for CY 2015

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), please find attached Skype Communications US Corp's CPNI compliance certification for calendar year 2015 applicable from its December 1, 2015 date of service launch.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Gunnar Halley".

Gunnar Halley  
Senior Attorney

Attachments

Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2015 from date of service launch on 1 December 2015.

Date filed: 1 March 2016

Name of Company covered by this certification: Skype Communications US Corp.

Form 499 Filer ID: 829151

Name of signatory: Ben Orndorff

Title of signatory: Vice President

Certification:

I, Ben Orndorff, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review).

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed,

Ben Orndorff  
Vice President

February 24, 2016

Date

Attachment: Accompanying statement explaining CPNI procedures

## Statement Explaining Skype Communications US Corp. CPNI Procedures

Skype Communications US Corp. (Skype) is the provider of Skype for Business services and has implemented the following procedures to ensure compliance of its regulated interconnected VoIP and conferencing services with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

It is Skype's policy not to use, disclose, or permit access to CPNI for the purpose of marketing among different categories of service offered by Skype or its affiliates nor to share CPNI of its customers with third party vendors or joint marketing agents for the purpose of marketing. Should Skype change this policy, it will establish procedures to ensure compliance with the notice and approval requirements governing the use or disclosure of CPNI for marketing purposes and the recordkeeping and supervisory review requirements associated with outbound sales and marketing campaigns.

Skype does not use, disclose, or permit access to CPNI for the purpose of identifying which customers call competing service providers nor does it use, disclose, or permit access to CPNI for the purpose of tracking customers that call competing service providers.

In some instances, Skype uses third party vendors for the purpose of providing the services to which its customers subscribe, including billing and customer service. Skype requires these third party vendors to adhere to its security policies governing the use, access, and disclosure of CPNI.

Skype's customer service representatives are not authorized to discuss call detail information on inbound telephone calls without first authenticating the customer through use of a PIN that satisfies the Commission's rules. Skype does not provide online access to CPNI without the provision of the customer's password which the customer creates without being prompted for the use of readily available biographical or account information. Skype does not maintain retail locations and does not provide in-store access to CPNI.

Skype provides training to personnel who could potentially access CPNI as to the FCC's CPNI rules, including when they are and are not authorized to use or disclose CPNI, and notifies them that they are subject to disciplinary action for any infractions. In addition, Skype maintains an alias monitored by in-house attorneys to which any employee may submit questions concerning policies and regulations governing CPNI.

Skype's services (branded as Skype for Business) are designed for enterprise users who satisfy the requirements of the business customer exemption, 47 C.F.R. § 64.2010(g), but Skype nevertheless offers a mechanism for customer administrators to receive notifications when changes are made to the account mechanisms that could be used to obtain access to their CPNI.

Skype has established a process to identify and report unauthorized access to CPNI data through the FCC's portal at <http://www.fcc.gov/eb/cpni> within seven business days of the determination of the breach. Skype's policy is to refrain from notifying customers or disclosing the breach for at least seven days after reporting to the portal, unless there is an urgent need in order to avoid immediate and irreparable harm and then only after consulting with the relevant investigating government agency. Thereafter, it is Skype's policy to notify customers of any breach, barring a law enforcement request to the contrary.

Skype has instituted a system of retaining electronic records for two years of any breaches discovered, notifications made to the FCC's portal, and notifications made to customers. The policy has been designed to ensure that those records will include the dates of discovery and notification, a description of the CPNI that was the subject of the breach, and a description of the circumstances of the breach.